

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARLENE ALOE,

Plaintiff,

-against-

NOTICE OF MOTION
18-CV-6090 (VSB)

THE CITY OF NEW YORK and CORRECTION OFFICERS
“JANE DOES #1-5” Correction Officers as yet unidentified
in their official and individual capacities,

Defendants.
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PLEASE TAKE NOTICE, that, upon the Declaration of Pamela S. Roth dated March 2, 2020, the exhibits annexed thereto, the accompanying Memorandum of Law dated March 2, 2020; and upon all prior pleadings and proceedings had herein, Plaintiff Marlene Aloe will move this Court before the Honorable Vernon S. Broderick, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, at at date and time to be determined by the Court, for an Order granting summary judgment to the plaintiff pursuant to Rule 56 of the Federal Rules of Civil Procedure, and for such other and further relief as this Court deems just and proper.

Dated: Brooklyn, New York
March 2, 2020

LAW OFFICE OF PAMELA S. ROTH, ESQ. P.C.
Attorney for Plaintiff
MARLENE ALOE
2747 Coney Island Avenue
Brooklyn, New York 11235
(888) 466-4884

By: _____
Pamela S. Roth, Esq.

To: James E. Johnson
Corporation Counsel of the City of New York
Attorney for Defendant City of New York
100 Church Street, Room 3-204
New York, New York 10007
(212) 356-5055
Attn: Katherine J. Weall, Senior Counsel

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LAW OFFICES OF PAMELA S. ROTH, ESQ. P.C.

Attorneys for Plaintiff

MARLENE ALOE

Office & Post Office Address

2747 Coney Island Avenue

Brooklyn, New York 11235

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Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney duly admitted to practice law in the State of New York, certifies that, upon information and belief based upon reasonable inquiry, the contentions contained in the annexed document are not frivolous.

Dated: _____

Signature: _____

Print Signer's Name: PAMELA S. ROTH

Service of a copy of the within ^ is hereby admitted

Dated,

^

Attorney(s) for ^